



1 Counsel for respondents herein, Edward Olsen, Assistant  
2 United States Attorney, United States Attorney Office, does not  
3 oppose this motion.

4 The reason for this motion is that counsel for petitioner  
5 has been in protracted contested habeas corpus proceedings in  
6 Garcia Garnica v. Chertoff, et. al., United States District  
7 Court, Northern District of California, Case No. C07-4953 SBA  
8 and Garcia Garnica v. Chertoff, et. al., United States Court of  
9 Appeals for the Ninth Circuit, Case No. 07-16737, for the past  
10 four days and has been unable to complete the reply due to the  
11 unanticipated conflict.

12 Based on the foregoing, it is respectfully requested that  
13 the motion be granted.

14 Dated: September 28, 2007

/s/

JAMES TODD BENNETT  
Attorney for Petitioner  
Navneet Ghotra

17  
18 **DECLARATION OF COUNSEL**

19 I, James Todd Bennett, hereby declare that:

20 1. I am an attorney at law, duly licensed to practice law  
21 by the California State Bar.

22 2. I am counsel of record for petitioner herein.

23 3. The reply to the Respondent's Opposition to Petition  
24 for Writ of Habeas Corpus is currently due by September 28, 2007  
25 by the court's order pursuant to stipulation by the parties.



PROPOSED ORDER

Upon a showing of good cause:

The time for petitioner to reply to the Respondent's  
Opposition to Petition for Writ of Habeas Corpus is extended to  
October 1, 2007.

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MAXINE M. CHESNEY  
United States District Judge